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July 28, 2021

VIA ECF

Hon. Naomi Reice Buchwald
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street, Courtroom 21A
New York, New York 10007-1312

Re: Stewart v. Stewart
Case No. 1:19-cv-05960-NRB

Dear Judge Buchwald:

On July 16, 2021, this Court denied Plaintiff's application for an extension of time to complete depositions of the parties, pursuant to this Court's Memorandum and Order dated April 26, 2021 (Doc. 95). Plaintiff proposed that such time to complete depositions be extended from August 25, 2021 until mid-September (Doc. 106). Plaintiff respectfully requests that this Court reconsider such extension based upon Plaintiff's inability to participate in depositions at this time. Plaintiff has serious medical issues which should be brought to the Court's attention for consideration. As such, Plaintiff cannot travel without serious risk to her health. Plaintiff does not foresee that this issue will be resolved on or before August 25, 2021.

Further, Plaintiff's attorneys respectfully request that this Court schedule a conference, at which time we may explain in further detail the extent of Plaintiff's medical issues that currently impede her from complying with this Court's Memorandum and Order.

Thank you for your consideration of this matter.

Sincerely,

A handwritten signature in purple ink, appearing to read 'E. Yankelunas', written over a faint, larger purple signature.

Edward P. Yankelunas

EPY/kms

CC: David P. Marcus, Esq. (*via ECF*)
Catherine Pastrikos Kelly, Esq. (*via ECF*)
David B. Grantz, Esq. (*via ECF*)
Javier M. Lopez, Esq. (*via ECF*)